

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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|-----------------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO.: 1:19-CR-251 |
| |) | |
| Plaintiff, |) | JUDGE SARA LIOI |
| |) | |
| v. |) | |
| |) | |
| ALQUIN WELLS, aka WORD, aka WILL, |) | |
| RONELLE DAVIS, |) | |
| MALCOLM COLLINS, |) | |
| TRAVON GALES, |) | |
| RONNIE EDGELL, |) | <u>PROTECTIVE ORDER</u> |
| LASHAUN MONCRIEF, |) | |
| MATTHEW KUCERA, |) | |
| AMBER MOORE, |) | |
| GLORIA HRDY, |) | |
| PATRICIA TRUMAN, |) | |
| MOLLY MEDLIK, |) | |
| CODY RAY LEE, |) | |
| LISA GOFORTH, |) | |
| SHAUNNA COLLIER, |) | |
| VIRGINIA MAY, |) | |
| TAMIE SEITZ, |) | |
| JOHN DICKSON, |) | |
| ELIZABETH GALLAGHER, |) | |
| BOBBI BOYLAN, |) | |
| IMANI NICHOLSON, |) | |
| DEMARCO CLAYTON, |) | |
| |) | |
| Defendants. |) | |

Upon motion of the United States of America, and for good cause shown, the Court hereby issues this Protective Order applicable to discovery disclosures in the above-captioned case:

1. All documents and electronically stored information disclosed by the United States to Defendants (“Discovery Material”) shall be used solely for the purpose of conducting pretrial, trial, and appellate proceedings in this action and for no other purpose.
2. In no event will Defendants or counsel for Defendants disclose, directly or indirectly, Discovery Material or the substance thereof to anyone, including the media, except as provided herein.
3. Only Defendants, counsel for Defendants, designated defense team members, or potential witnesses may view the Discovery Material, which is to remain in the sole custody of counsel for Defendants or their designated agents at all times. However, defense counsel may provide copies of the intercepted telephone calls and text messages to their clients. All other Discovery Material must remain in the sole custody of counsel for Defendants or their designated agents.
4. Prior to disclosure of the Discovery Material to a potential witness, counsel for Defendants must redact any personal identifying information.¹ Redaction is not required if the personal identifying information belongs to the witness to whom the Discovery Material is disclosed.
 - a. Prior to the actual disclosure to a potential witness, counsel for Defendants must read or summarize the pertinent parts of this Order to the witness or provide a

¹ Personal identifying information includes the name, social security number, national identification number, date of birth, physical address, telephone number, email address, IP address, vehicle license plate number, Vehicle Identification Number, driver’s license or other identification card number, fingerprints, handwriting, credit or debit card number, financial account number, birthplace, and/or genetic information of any individual.

copy of this Order to the witness, and orally advise the witness of his or her obligation to comply with its terms.

- b. The witness to whom disclosure is made shall not retain Discovery Materials or any copies thereof.
- 5. Nothing in this Order shall operate or be construed to operate as restricting Defendants' right to meaningful communication with their defense counsel or to abrogate the United States' duty to provide exculpatory evidence to Defendants.
- 6. Nothing in this Order shall prevent the United States or Counsel for Defendants from using Discovery Material in connection with any hearings or pleadings or motions filed in this case, provided that such material is properly redacted or, if such redaction cannot be readily accomplished, filed under seal.
- 7. Leave to deviate from the conditions of this Order must be requested from the Court in writing.
- 8. Failure to comply with the terms of this Order is punishable by contempt of court or by whatever other sanction deemed the Court shall deem just.

This Order will remain in effect until further order of the Court.

IT IS SO ORDERED.

SARA LIOI
UNITED STATES DISTRICT JUDGE

DATE: _____